

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION**

Thomas Brock and Dana Brock,)	District Court Action No.:
)	State Court Action No.: 2022-CP-04-00102
Plaintiff,)	
)	
v.)	DEFENDANT FOXFARM SOILS
)	& FERTILIZERS CO.'S
Foxfarm Soils & Fertilizers Co.,)	NOTICE OF REMOVAL
)	
Defendant.)	

TO: THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF SOUTH CAROLINA:

Notice is hereby given that the undersigned counsel, as attorneys for Foxfarm Soils & Fertilizers Co., hereby removes this civil action presently pending in the Court of Common Pleas for the County of Anderson, State of South Carolina (Civil Action No. 2022-CP-04-00102) to the United States District Court for the District of South Carolina, Anderson Division, pursuant to the provisions of 28 U.S.C. §§ 1332, 1441(b) and 1446. Defendant alleges the following grounds for removal:

1. Plaintiffs, upon information and belief, are citizens and residents of the State of South Carolina.
2. Defendant, Foxfarm Soils & Fertilizers Co., is a company organized and existing under the laws of California with its principal place of business in the State of Arizona.
3. The Summons and Complaint in this action were served upon Foxfarm Soils & Fertilizers Co. on February 1, 2022.
4. A copy of the Summons and Complaint is attached hereto and incorporated herein by reference as Exhibit A.

5. Thirty (30) days have not elapsed from the service of the Summons and Complaint and the defendants have not entered an appearance in this action.

6. Plaintiffs seek an unspecified amount in their prayer for actual and punitive damages for claims for negligence.

7. Based upon the complete diversity of the citizenship for parties hereto, and with the amount in controversy exceeding \$75,000.00, exclusive of interest and costs, this matter is cognizable in the United States District Court for the District of South Carolina pursuant to the provisions of 28 U.S. Code § 1332 and may be removed to the United States District Court pursuant to the provisions of 28 U.S. Code § 1441.

8. Contemporaneously with the filing of the within Notice of Removal in the United States District Court for the District of South Carolina, Columbia Division, written notice of such filing will be given to the undersigned counsel for the plaintiff and copies of this notice will be filed with the Clerk of Court of Common Pleas for Anderson County, South Carolina.

WHEREFORE, having fully provided notice as required by law, the above captioned action should be removed to the United States District Court for the District of South Carolina, Anderson Division.

February 21, 2022

/s/Catharine Garbee Griffin
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